

Ms. Maureen McGrail
BP Amoco Petroleum Products - Whiting Business Unit
2815 Indianapolis Road
Whiting, IN 46394

Re: Minor Source Modification No:
089-11960-00003

Dear Ms. McGrail:

BP Amoco Petroleum Products - Whiting Business Unit applied for a Part 70 operating permit on September 30, 1996 for a petroleum refinery. An application to modify the source was received on March 1, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

One (1) internal floating roof storage tank with a geodesic dome and secondary seal, designated as Tank #3705, with a maximum capacity of 3,870,720 gallons, a vapor pressure less than 15 psia, stores HVN and exhausts to the atmosphere.

This new tank replaces existing Tank #3705. The existing internal floating storage tank stored petroleum hydrocarbon with a vapor pressure less than 15 psia, was constructed in 1944 and had a maximum storage capacity of 3,055,954 gallons.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**BP Amoco Petroleum Products - Whiting Business Unit
2815 Indianapolis Road
Whiting, IN 46394**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 089-11960-00003	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Certification

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a petroleum refinery.

Responsible Official:	Ms. Maureen McGrail
Source Address:	2815 Indianapolis Road, Whiting, IN 46394
Mailing Address:	2815 Indianapolis Road, Whiting, IN 46394
Phone Number:	219-473-3234
SIC Code:	2911
County Location:	Lake
County Status:	Nonattainment for PM ₁₀ , Ozone and SO ₂ Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) internal floating roof storage tank with a geodesic dome and secondary seal, designated as Tank #3705, with a maximum capacity of 3,870,720 gallons, a vapor pressure less than 15 psia, stores HVN and exhausts to the atmosphere.

This new tank replaces existing Tank #3705. The existing internal floating storage tank stored petroleum hydrocarbon with a vapor pressure less than 15 psia, was constructed in 1944 and had a maximum storage capacity of 3,055,954 gallons.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60.7, Any owner or operator shall furnish the Administrator and IDEM written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Actual start-up date (within 15 days after such date); and
- (c) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM-OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)].

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM,, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) internal floating roof storage tank with a geodesic dome and secondary seal, designated as Tank #3705, with a maximum capacity of 3,870,720 gallons, a vapor pressure less than 15 psia, stores HVN and exhausts to the atmosphere.

This new tank replaces existing Tank #3705. The existing internal floating storage tank stored petroleum hydrocarbon with a vapor pressure less than 15 psia, was constructed in 1944 and had a maximum storage capacity of 3,055,954 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels) [326 IAC 12-1]

Pursuant to 326 40 CFR Part 60, Subpart Kb (Wood Furniture and Cabinet Coating), the owner or operator of the storage vessel designated as Tank #3705, shall equip such storage vessel with the control equipment specified in §60.112b, Standard for volatile organic compounds (VOC), including a fixed roof in combination with an internal floating roof meeting the specifications in §60.112b(a)(1).

D.1.2 40 CFR 63.640 (Subpart CC), National Emission Standards for Hazardous Air Pollutants (NESHAP) from Petroleum Refineries [326 IAC 20-1]

Pursuant to 40 CFR 63.640 (Subpart CC), National Emission Standards for Hazardous Air Pollutants (NESHAP) from Petroleum Refineries, each owner or operator of an affected storage vessel under this subpart shall comply with the appropriate requirements under §63.642 (General Standards) and §63.646 (Storage vessel provisions), and shall include the annual HAP emissions from these facilities when determining the controlled HAP emissions level for the source pursuant to §63.642(g).

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

IDEM may require compliance testing at any specific time when necessary to determine if the source is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.1.1 and D.1.2, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels) Monitoring

Pursuant to 40 CFR Part 60, Subpart Kb, the owner or operator of each storage vessel as specified in §60.112b(a), shall meet the requirements of §60.113b, Testing and Procedures, including the following:

- (a) Visually inspect the internal floating roof, the primary seal and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. The owner or operator shall be responsible for repairs of the storage vessel as described in §60.113b(a)(1).
- (b) For vessels equipped with liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) as specified in §60.113b(a)(2).

- (c) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
 - (1) Visually inspect the vessel as specified in §60.113b(a)(4) at least every five (5) years; or
 - (2) Visually inspect the vessel as specified in §60.113b(a)(2).
- (d) Visually inspect the internal floating roof, the primary seal and the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) as specified in §60.113b(a)(4).
- (e) The owner or operator shall notify the Administrator and IDEM in writing at least thirty (30) days prior to filling or refilling of the storage vessel as specified in §60.113b(a)(5).

D.1.5 40 CFR 63.640 (Subpart CC), National Emission Standards for Hazardous Air Pollutants (NESHAP) from Petroleum Refineries Monitoring

Pursuant to 40 CFR 63.640 (Subpart CC), the owner or operator of each storage vessel shall meet the requirements of §63.120, Testing and Procedures, including the following:

- (a) Visually inspect the internal floating roof, the primary seal and the secondary seal (if one is in service), according to the schedule specified in §63.120.
- (b) For vessels equipped with a single-seal system, the owner or operator shall perform the following inspections:
 - (1) Visually inspect the internal floating roof and the seal through manholes and roof hatches on the fixed roof as specified in §63.120(a)(2)(i); and
 - (2) Visually inspect the internal floating roof, seal, gaskets, slotted membranes and sleeve seals (if any) as specified in §63.120(a)(2)(ii).
- (c) For vessels equipped with a double-seal system as specified in §63.119(b)(3)(iii):
 - (1) Visually inspect the vessel as specified in §63.120(a)(3)(i) at least every five (5) years; or
 - (2) Visually inspect the vessel as specified in §63.120(a)(3)(ii) and §63.120a(3)(iii).
- (d) The owner or operator shall be responsible to make all necessary repairs as specified in §63.120(a)(4) through §63.120(a)(7).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall keep copies of all records as required by §60.116b, Monitoring of Operations, including the following:
 - (1) maintain the records of the volatile organic liquid (VOL) stored;
 - (2) the period of storage;
 - (3) the maximum true vapor pressure of the volatile organic liquid (VOL) during the respective storage period;

- (4) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel; and
 - (5) shall notify the Administrator within thirty (30) days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. (Available data on the storage temperature may be used to determine the maximum vapor pressure as determined in 40 CFR Part 60.117b(e)(1)-(3)).
- (b) To document compliance with Condition D.1.1, the Permittee shall keep copies of all records and furnish reports as require shall keep copies of all records ed by §60.115b, Reporting and Record Keeping Requirements, including the following:
 - (1) Maintain records of inspection, including the identity of the storage vessel inspected, the date of inspection and the observed conditions.
- (c) To document compliance with Condition D.1.2, the Permittee shall keep copies of all records as required by §63.642 and §63.123.
- (d) To document compliance with 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), the Permittee shall maintain records of the following:
 - (1) the types of volatile petroleum liquids stored;
 - (2) the maximum true vapor pressure; and
 - (3) records of the inspections.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

- (a) The Permittee shall submit to the Administrator and IDEM the applicable information as specified in §63.122 and §63.642.
- (b) The Permittee shall submit to the Administrator and IDEM the applicable information as specified in §60.115b.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: BP Amoco Petroleum Products - Whiting Business Unit
Source Address: 2815 Indianapolis Road, Whiting, IN 46394
Mailing Address: 2815 Indianapolis Road, Whiting, IN 46394
Source Modification No.: 089-11960-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for the First Part 70 Minor Source Modification.

Source Background and Description

Source Name:	BP Amoco Petroleum Products - Whiting Business Unit
Source Location:	2815 Indianapolis Blvd., Whiting, Indiana 46394
County:	Lake
SIC Code:	2911
First Minor Source Modification No.:	089-11960-00003
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed an application for a modification from BP Amoco Petroleum Products - Whiting Business Unit relating to the construction of the following emission units and pollution control devices:

- (a) One (1) internal floating roof storage tank with a geodesic dome and secondary seal, designated as Tank #3705, with a maximum capacity of 3,870,720 gallons, a vapor pressure less than 15 psia, stores HVN and exhausts to the atmosphere.

This new tank replaces existing Tank #3705. The existing internal floating storage tank stored petroleum hydrocarbon with a vapor pressure less than 15 psia, was constructed in 1944 and had a maximum storage capacity of 3,055,954 gallons.

History

On September 30, 1996, BP Amoco Petroleum Products - Whiting Business Unit submitted their Part 70 (T-089-6741-00453) application. On March 1, 2000, BP Amoco Petroleum Products - Whiting Business Unit submitted an application to the OAM requesting to add a new storage tank to replace the existing storage tank to their existing plant.

Source Definition

This petroleum refining, storage and distribution operation consists of two (2) plants:

- (1) The Refinery is located at 2815 Indianapolis Boulevard, Whiting, Indiana 46394; and
- (2) The Marketing Terminal is located at 2530 Indianapolis Boulevard, Whiting, Indiana 46394.

Since the two (2) plants are located in contiguous properties and are owned by one (1) company, they will be considered one (1) source.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 1, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The applicant based the emission calculations on AP-42 Section 7 (Liquid Storage Tanks). The results of the tanks program are as follows:

VOC PTE = 58.0929 pounds per month * 12 months per year * ton/2000 pounds = 0.348 tons per year.

Combination HAPs = 0.006 pounds per hour 8760 hours per year 8 ton/2000 pounds = 0.027 tons per year.

Worst Case Single HAP = 0.003 pounds per hour of Hexane * 8760 hours per year 8 ton/2000 pounds = 0.013 tons per year.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	0.34
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Benzene	0.0018
Cumene	0.0002
Ethyl benzene	0.0013
Hexane	0.0131
Phosphorus	8.76E-07
Toluene	0.0057
o-Xylene	0.0013
m-Xylene	0.0026
p-Xylene	0.0009
TOTAL	0.013

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6).

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate non-attainment
SO ₂	primary non-attainment
Ozone	severe non-attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as non-attainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) This area of Lake County has been classified as attainment or unclassifiable for Lead and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) This area of Lake County has been classified as non-attainment for SO₂ and PM₁₀. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-089-6741-00453) application on September 30, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels):

Tank #3705 is subject to 40 CFR Part 60, Subpart Kb because the maximum capacity is greater than 40 m³ that is used to store volatile organic liquids (including petroleum) for which construction, reconstruction, or modification commenced after July 23, 1984.

- (a) The owner or operator of the storage vessel designated as Tank #3705, shall equip such storage vessel with the control equipment specified in §60.112b, Standard for volatile organic compounds (VOC), including a fixed roof in combination with an internal floating roof meeting the specifications in §60.112b(a)(1).
- (b) The owner or operator of each storage vessel as specified in §60.112b(a), shall meet the requirements of §60.113b, Testing and Procedures, including the following:
 - (1) Visually inspect the internal floating roof, the primary seal and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. The owner or operator shall be responsible for repairs of the storage vessel as described in §60.113b(a)(1).

- (2) For vessels equipped with liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) as specified in §60.113b(a)(2).
- (3) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
 - (A) Visually inspect the vessel as specified in §60.113b(a)(4) at least every five (5) years; or
 - (B) Visually inspect the vessel as specified in §60.113b(a)(2).
- (4) Visually inspect the internal floating roof, the primary seal and the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) as specified in §60.113b(a)(4).
- (5) The owner or operator shall notify the Administrator and IDEM in writing at least thirty (30) days prior to filling or refilling of the storage vessel as specified in §60.113b(a)(5).
- (c) The owner or operator shall keep copies of all records and furnish reports as required by §60.115b, Reporting and Record Keeping Requirements, including the following:
 - (1) Submit a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).
 - (2) Maintain records of inspection, including the identity of the storage vessel inspected, the date of inspection and the observed conditions.
- (d) The owner or operator shall keep copies of all records required by §60.116b, Monitoring of Operations, including the following:
 - (1) maintain the records of the volatile organic liquid (VOL) stored;
 - (2) the period of storage;
 - (3) the maximum true vapor pressure of the volatile organic liquid (VOL) during the respective storage period;
 - (4) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel; and
 - (5) shall notify the Administrator within thirty (30) days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. (Available data on the storage temperature may be used to determine the maximum vapor pressure as determined in 40 CFR Part 60.117b(e)(1)-(3)).

40 CFR 63.640 (Subpart CC), National Emission Standards for Hazardous Air Pollutants (NESHAP) from Petroleum Refineries, is applicable to this source. Each owner or operator of an affected storage vessel under this subpart shall comply with the appropriate requirements under §63.642 (General Standards) and §63.646 (Storage vessel provisions), and shall include the annual HAP emissions from these facilities when determining the controlled HAP emissions level for the source pursuant to §63.642(g).

There are no other applicable New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP).

State Rule Applicability

326 IAC 2-1-3.4 (New Source Toxics Control) does not apply because emissions of single hazardous air pollutants (HAPs) are less than 10 tons per year and emissions of a combination of HAPs are less than 25 tons per year.

326 IAC 2-3 (Emission Offsets)

This modification to an existing major stationary source is not major because the potential to emit of VOC is less than the de minimus level (fifteen (15) pounds per day). Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

No 326 IAC 6 rules apply to the tank since there are no PM emissions associated with this unit.

326 IAC 8-4-3 (Petroleum liquid storage facilities)

This rule applies to storage tank 3705 because the tanks are each greater than 39,000 gallons in capacity and store, or could store, a volatile organic liquid which has a true vapor pressure greater than 10.5 kPa. The owner or operator shall maintain records as required in 326 IAC 8-4-3 including the following:

- (a) the types of volatile petroleum liquids stored;
- (b) the maximum true vapor pressure; and
- (c) records of the inspections.

326 IAC 8-7 (Specific VOC reduction requirements for Lake, Porter, Clark, and Floyd Counties)

This rule does not apply to the tanks because they are volatile organic liquid storage tanks.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This rule does not apply to storage tank #3705 because even though this stationary vessel is used to store volatile organic liquid (VOL) and is located in Lake County, this storage vessel is subject to 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels).

No other 326 IAC 8 rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) The storage tank will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) Calculations were submitted by the source and are summarized in the Potential to Emit table on Page 2 of this TSD.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed First Part 70 Minor Source Modification No. 089-11960-00003.